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REPORTS ANALYSIS
DIVISION
October 26, 1998
5 24 PM '98

Mr. Neil A. Evans
Reports Analyst
Reports Analyst Division
Federal Election Commission
Washington, D.C. 20463

Re: Identification Number: C00004036
SEIU Committee on Political Education
July Monthly Report (6/1/98 - 6/30/98)

Dear Mr. Evans:

This is in response to your letter of September 9, 1998, regarding the Service Employees International Union's Committee on Political Education's ("COPE") July 1998 monthly report. With respect to your inquiry regarding the status of Local 1199 Political Action Fund, please be advised that Local 1199NUHCE recently affiliated with the Service Employees International Union ("SEIU"). By virtue of the union affiliating with SEIU, its political committee, the Local 1199 Political Action Fund, became an affiliated committee of SEIU's COPE. SEIU has already filed an amended statement of organization reflecting that the Local 1199 Political Action Fund is now an affiliated committee to SEIU COPE. I have been informed by SEIU Local 1199NUHCE that it will also file an amended statement of organization reflecting that its political committee has become affiliated with SEIU COPE, if it has not already done so.

With respect to your second inquiry, after Local 1199 Political Action Fund became an affiliated committee of SEIU COPE, it transferred \$770,714 to SEIU COPE. As you noted, that transfer was reported by SEIU to FEC. It is my understanding that, through oversight, the Local 1199 Political Action Fund did not report the transfer out but will file an amended report showing the transfer out.

With respect to your final question, it appears that SEIU has improperly designated contributions made to Miles Rapoport and to Charlotte Koskoff. The March 31, 1998, contribution of \$5,000 to Mr. Rapoport should have been designated as a convention contribution. In Connecticut, the Democratic Party has both a convention and, in some cases, a primary. The FEC considers the convention and the primary to be two separate elections with two separate contribution limits. We have already filed an amended report for March 1988 reflecting this. I have been told by Mr. Rapoport's campaign that it treated the March 1998 contribution as a contribution to the convention campaign.

ANDREW L. STERN
International President

BETTY BEDNARCZYK
International Secretary-Treasurer

ANNA BURGER
Executive Vice President

PATRICIA ANN FORD
Executive Vice President

EIKEO MEDINA
Executive Vice President

PAUL POLICICCHIO
Executive Vice President

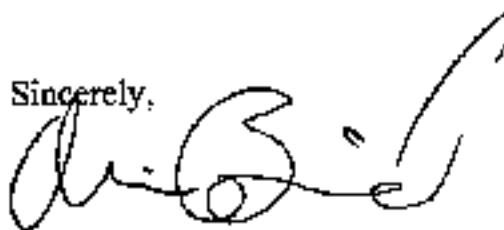
SERVICE EMPLOYEES
INTERNATIONAL UNION
AFL-CIO, CLC

1313 I Street, N.W.
Washington, D.C. 20005
202.898.3200
TDD: 202.898.3481
www.seiu.org

Likewise, with respect to Charlotte Koskoff, the December 19, 1997, contribution to her campaign was a contribution to the convention campaign. It was improperly designated on our report as a contribution to the primary. However, we have already filed an amended report to show that it was for the convention campaign. I have been told by Ms. Koskoff's campaign committee that it treated this as a contribution to the convention campaign. The second contribution to Ms. Koskoff's campaign, made on June 23, 1998, was a contribution to the general election. She did not participate in a primary. Our report improperly designated the June 1998 contribution as a contribution to the primary. We will file an amended report reflecting that it was a contribution to her general election campaign. I have been told by her campaign committee that they have treated the June 23, 1998 contribution as a contribution to her general election campaign.

If you have any further questions regarding these matters, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Orrin Baird", written in a cursive style.

Orrin Baird
Associate General

ODB/lmwk

cc: Executive Vice President Pat Ford

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
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AW
PREPARER

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